

IN THE UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA : **CRIMINAL NO.:**_____

V. : DATE FILED: _____

EDWARD ROSS

- :** **VIOLATIONS:**
- :** **21 U.S.C. § 841(a)(1)**
- :** **(distribution of cocaine - 5 counts)**
- :** **21 U.S.C. § 841(a)(1)**
- :** **(possession with the intent to distribute more than 500 grams of cocaine - 1 count)**
- :** **18 U.S.C. § 924(c)(1) (possession of a firearm in furtherance of a drug trafficking crime - 1 count)**
- :** **18 U.S.C. § 922(o) (felon in possession of a machine gun - 1 count)**
- :** **18 U.S.C. § 922(g)(1) (felon in possession of a firearm - 2 counts)**
- :** **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 19, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 25, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 25, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly and intentionally possessed with intent to distribute more than 500 grams of cocaine,
that is, approximately 600 grams of, a mixture or substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly possessed a firearm, that is, a Colt double action revolver, model Detective Special, .38 special, serial number C07946, loaded with live ammunition, a Quality Firearms Incorporated semiautomatic pistol, model S.A. 25, caliber .25 A.C.P., serial number obliterated, and a SWD M-11/NINEmm caliber 9mm machine gun, serial number 89-0035335, loaded with live ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a).

In violation of Title 18, United States Code, Section 924(c)(1)(A), (c)(1)(A)(i),
(c)(1)(B)(ii).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS

knowingly possessed in and affecting interstate commerce a machine gun, that is, a SWD M-11/NINEmm, caliber 9mm, machine gun, serial number 89-0035335, loaded with live ammunition.

In violation of Title 18, United States Code, Section 922(o)(1).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of Pennsylvania,
defendant

EDWARD ROSS,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Quality Firearms Incorporated semiautomatic pistol, model S.A. 25, caliber .25 A.C.P., serial number obliterated, and a SWD M-11/NINEmm, caliber 9mm, machine gun, serial number 89-0035335, loaded with live ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 23, 2004, in Chester City, in the Eastern District of
Pennsylvania, defendant

EDWARD ROSS,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime
punishable by imprisonment for a term exceeding one year, knowingly possessed in and
affecting interstate commerce a firearm, that is, a Colt double action revolver, model Detective
Special, .38 special, serial number C07946, loaded with live ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(i), 922(o), and 924(c) set forth in Counts Seven - Ten of this Indictment, the defendant

EDWARD ROSS

shall forfeit to the United States of America all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

1. a Colt double action revolver, model Detective Special, .38 special, serial number C07946, loaded with live ammunition;
2. a Quality Firearms Incorporated semiautomatic pistol, model S.A. 25, caliber .25 A.C.P., serial number obliterated;
3. a SWD M-11/NINEmm serial number 89-0035335, caliber 9mm, machine gun, serial number 89-0035335, loaded with live ammunition; and,
4. one (1) box of .38 caliber ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

**_____
GRAND JURY FOREPERSON**

**_____
PATRICK L. MEEHAN
UNITED STATES ATTORNEY**